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*Proposed Counsel for the Debtors,
Debtors in Possession and Plaintiffs*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re:	:
	:
MPM Silicones, LLC, <u>et al.</u> ¹ ,	:
	:
Debtors.	:
_____	:
	: Chapter 11
MOMENTIVE PERFORMANCE MATERIALS	:
INC., MOMENTIVE PERFORMANCE	: Case No. 14-22503 (RDD)
MATERIALS WORLDWIDE INC.,	: (Jointly Administered)
MOMENTIVE PERFORMANCE MATERIALS	:
USA INC., JUNIPER BOND HOLDINGS I LLC,	:
JUNIPER BOND HOLDINGS II LLC, JUNIPER	:
BOND HOLDINGS III LLC, JUNIPER BOND	:
HOLDINGS IV LLC, MOMENTIVE	: Adversary Proceeding
PERFORMANCE MATERIALS QUARTZ, INC.,	: No. 14-08227 (RDD)
MPM SILICONES, LLC, MOMENTIVE	:
PERFORMANCE MATERIALS SOUTH	:
AMERICA INC., MOMENTIVE	:
PERFORMANCE MATERIALS CHINA SPV	:
INC.	:
	:
Plaintiffs,	:
	:
	:
	:

¹ The Debtors in these Chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are Juniper Bond Holdings I LLC (9631), Juniper Bond Holdings II LLC (9692), Juniper Bond Holdings III LLC (9765), Juniper Bond Holdings IV LLC (9836), Momentive Performance Materials China SPV Inc. (8469), Momentive Performance Materials Holdings Inc. (8246), Momentive Performance Materials Inc. (8297), Momentive Performance Materials Quartz, Inc. (9929), Momentive Performance Materials South America Inc. (4895), Momentive Performance Materials USA Inc. (8388), Momentive Performance Materials Worldwide Inc (8357), and MPM Silicones, LLC (5481).

v. :
:
THE BANK OF NEW YORK MELLON TRUST :
COMPANY, N.A., solely as Trustee for the MPM :
Escrow LLC and MPM Finance Escrow Corp. :
8.875% First Priority Senior Secured Notes due :
2020, :
Defendant. :

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STIPULATION AND ORDER EXTENDING TIME TO ANSWER COMPLAINT

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned
counsel for the parties to this action, as follows:

The Bank of New York Mellon Trust Company, N.A.'s time to answer, move,
counterclaim or otherwise respond to the Complaint in this action is extended through and
including June 18, 2014. The parties agree that each expressly reserves all of its defenses and
rights with respect to this action.

Dated: New York, New York.
May 21, 2014

WILLKIE FARR & GALLAGHER LLP

Dated: New York, New York.
May 21, 2014

DECHERT LLP

By: /s/ Joseph T. Baio

Joseph T. Baio
Dan C. Kozusko

787 Seventh Avenue
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*Proposed Counsel for Debtors,
Debtors in Possession and Plaintiffs*

By: /s/ Michael J. Sage

Michael J. Sage
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*Counsel for Defendant
The Bank of New York Mellon Trust Company,
N.A.*

SO ORDERED this 2nd day of June, 2014

/s/Robert D. Drain

THE HONORABLE ROBERT D. DRAIN
United States Bankruptcy Judge